



FAIR POLITICAL PRACTICES COMMISSION

428 J Street • Suite 620 • Sacramento, CA 95814-2329

(916) 322-5660 • Fax (916) 322-0886

September 9, 2010

Ms. Linda Ford

Redacted

RE: FPPC File No. 10/758; Patrick Hume

Dear Ms. Ford:

This letter is to notify you that the Enforcement Division of the Fair Political Practices Commission (the "FPPC") will investigate the allegation(s), under the jurisdiction of the FPPC, of the sworn complaint you submitted in the above-referenced matter. You will next receive notification from us upon final disposition of the case. However, please be advised that at this time we have not made any determination about the validity of the allegation(s) you have made or about the culpability, if any, of the person(s) you identify in your complaint.

Thank you for taking the time to bring this matter to our attention.

Sincerely,

Redacted

Roman G. Porter
Executive Director

RGP/tr

cc: Patrick Hume

SWORN COMPLAINT FORM

(Form May Be Subject to Public Disclosure)*

AS REQUIRED BY GOVERNMENT CODE SECTION 83115, please complete the form below to file a sworn complaint with the Fair Political Practices Commission. **This form must be completed in its entirety and all pertinent information must be stated on this form, not as an attachment.**

Mail the complaint to: **Enforcement Division
Fair Political Practices Commission
428 J Street, Suite 620
Sacramento, California 95814**

Person Making Complaint

Last name: Ford

First Name: Linda

Street Address:
Redacted

City: Redacted State: Redacted

Zip: Redacted

Telephone: Redacted

Fax: () -

E-mail: Redacted

***IMPORTANT NOTICE**

Under the California Public Records Act (Gov. Code Section 6250 and following), this sworn complaint and your identity as the complainant may be subject to public disclosure. Unless the Chief of Enforcement deems otherwise, within three business days of receiving your sworn complaint we will send a copy of it to the persons(s) you allege violated the law.

In some circumstances, the FPPC may claim your identity is confidential, and therefore not subject to disclosure. A court of law could ultimately make the determination of confidentiality. If you wish the FPPC to consider your identity confidential, do not file the complaint before you contact the FPPC (916-322-5660 or toll free at 866-ASK-FPPC) and discuss the complaint with an Enforcement Division attorney.

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RECEIVED
FAIR POLITICAL
PRACTICES COMMISSION

Complaint

Person or Persons who Allegedly Violated the Political Reform Act: (If there are multiple parties involved, attach additional pages as necessary.)

Last Name: Hume

First Name: Patrick

Street Address:
Redacted

City: Redacted State: Redacted

Zip: Redacted

Telephone: (Redacted)

Fax: (Redacted)

E-mail: Redacted

Provision or Provisions of the Political Reform Act Allegedly Violated: (If specific sections are not known, please provide a brief summary of the nature of the violation(s), and when it (they) occurred.) **You must state the suspected violation(s) on this form.**

Form 700 - Statement of Economic Interests

Failure to report meals over the \$50 limit and gifts in excess of \$420 for the years ending 2008 and 2009.

Campaign finance law serves a purpose to protect the public. If elected officials, even at the local level, have blatant disregard for the laws, filing complaints and having the California Fair Political Practices Commission (FPPC) hold elected officials to the letter of the law make it easier for regular citizens to make a difference in politics.

Governmental agencies such as the FPPC exist so that government is transparent and remains free of corruption. That is the basis of this complaint.

Elk Grove City Council member Patrick Hume repeatedly violated campaign finance law regarding the reporting of gifts, meals and other reportable items on his yearly Statement of Economic Interests, Form 700. Even when reporting errors and emissions were brought to his attention by citizens, the press and the City Clerk of the city of Elk Grove, Mrr. Hume repeatedly and deliberately failed to amend reports that he knowingly and willingly signed under penalty of perjury. Year and year Council member Hume has done so with no consequences for his illegal actions.

Description, With as Much Particularity as Possible, of Facts Constituting Alleged Violation and how you have personal knowledge that it occurred**

Failure to report gifts and meals received from a constituent in 2008 over the legal limit of \$420.
(Ties, golf shirts, wine and expensive meals) by Constance Conley

Failure to report meals provided at the Sacramento Metro Chamber of Commerce Cap to Cap trip for the years 2008 and 2009 even after receiving repeated notification to do so. Meals in excess of the \$50 legal requirement which must be reported. They include:

2008: Gen Corp. \$60.57 • Teichert Construction \$98.00 • Gregory Thatch \$65.00
Sutter Health \$98.00

2009: Gregory Thatch \$145.00 • Sutter Health Corp. \$98.00 • Teichert \$98.00
PG & E \$72.00

Failure to report gifts and meals, in an act or omission, by Mr. Hume was "willfully" done, done voluntarily and intentionally and with the specific intent to do something the law forbids, and with the specific intent to fail to do something the law requires to be done, was done with purpose to disobey and to disregard the law. Mr. Hume acted "knowingly" when he acted, totally aware of the nature of his conduct. (State v. Kroll, Mo.App., 682 S.W.2d 78, 81.)

Please attach copies of any available documentation that is evidence of the violation, (for example, checks, campaign materials, etc., if applicable to the complaint). **Note that a newspaper article is NOT considered evidence of a violation.

Name and Addresses of Potential Witnesses, in addition to yourself, if Known:

Last Name: Conley

First Name: Constance

Street Address:
Redacted

City: Redacted State: Redacted

Zip: Redacted

Telephone: Redacted

Fax: Redacted

E-mail: Redacted

Last Name: Lindgren

First Name: Jason

Street Address:
Redacted

City: Redacted State: Redacted

Zip: Redacted

Telephone: (Redacted)

Fax: Redacted

E-mail: Redacted

Last Name: _____

First Name: _____

Street Address:

City: _____ State: _____

Zip: _____ - _____

Telephone: (_____) _____ - _____

Fax: (_____) _____ - _____

E-mail: _____

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Redacted

(Signature)

Linda A. Ford

(Please print your name)

August 30, 2010

(Date)